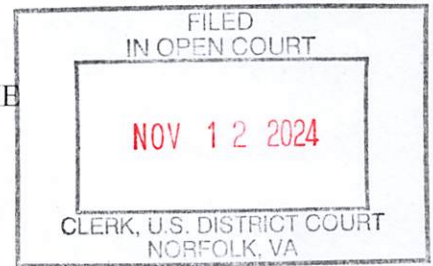


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Norfolk Division



UNITED STATES OF AMERICA

v.

GARY OWENS, JR.,

Defendant.

No. 2:24-CR-78

STATEMENT OF FACTS

The United States of America and the defendant, GARY OWENS, JR. (hereinafter, "the defendant"), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. Between 2021 and 2023, the defendant lived in Suffolk, Virginia (hereinafter, "Suffolk"), and at all relevant times was located in the Eastern District of Virginia. During this time, the defendant engaged in a scheme in which he "catfished" teenage boys, i.e., he pretended to be a minor female named "Jessica Lincon" on Instagram before enticing these boys to Kik in order to obtain sexually explicit images and videos from them. The defendant used sexually explicit and other images of a real, adult woman in order to do so; these images are available online. During this timeframe, the defendant was 39-40 years old.

2. MINOR 1: Between on or about February 20, 2022, and on or about October 31, 2022, in Prince William County and Suffolk, within the Eastern District of Virginia, the defendant used his Jessica Lincon persona on Instagram and Kik – smartphone messenger chat applications that require use of the Internet -- to knowingly persuade, induce, entice, and coerce MINOR 1, who was seventeen years old and who the defendant knew was a minor, to produce child pornography, in violation of 18 U.S.C. § 2251(a), (e).

[Handwritten signatures and initials]
JAW ERG

a. Specifically, on or about October 31, 2022, in Prince William County and Suffolk, the defendant in the guise of “misslincon Jessica Lincon” used Kik to employ, use, persuade, induce, entice, and coerce MINOR 1, who was then seventeen years old and who the defendant knew was a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, knowing and having reason to know that the visual depiction would be transported or transmitted over the Internet and saved to an iPad Pro [S/N Q63N7DPX24], which was manufactured in China, all in violation of 18 U.S.C. § 2251(a), (e), as follows:

Minor 1: *hey*
Defendant: *hey wyd bby*
Minor 1: *nothin*
u go first ok bby
Defendant: *what you got on bby*
Minor 1: *nothing*
wbu
Defendant: *you're lying*
Minor 1: *well i got underwear on but like basically nothing*
Defendant: *lemme see*

b. At the defendant's direction, MINOR 1 sent a picture to the defendant, which shows his legs and the bottom of his torso as he appears to be under a blanket. In the picture, MINOR 1's underwear is shown. The conversation then continued as follows:

Defendant: *want me to suck you*
Minor 1: *yes*
Defendant: *make it move krnmrcsee*
lemme see
Minor 1: *u gotta send something first*

c. The defendant then sent a picture to MINOR 1. The picture shows a nude female on her knees facing the camera as the female leans forward and rests on her elbows. The photo shows a portion of the female's face, her back, and her bare buttocks. In the picture, the

female's chest is close to the ground as she leans forward. The conversation then continued as follows:

Defendant: *uh huh*

Victim 1: *hot asf*

Defendant: *make it move bby*

Victim 1: *its not hard enough yet u gotta send me ur tits or something*

Defendant: *get me wetter lemme see you head to toe laying in bed in undies on video*

d. At the defendant's direction, MINOR 1 sent a video to him. The video, which lasts approximately four seconds, shows MINOR 1's body with underwear on as he lies on a bed. The conversation then continued as follows:

Defendant: *you wanna fuck me bby*

Minor 1: *yes ofc*

Defendant: *raw or no*

Minor 1: *u wanna fuck me?*

and raw fs

Defendant: *yes bby*

take ur undies off lemme watch idc if it's soft we will make it hard

Minor 1: *ok bby*

e. Again, in response to the direction provided by the defendant, MINOR 1 sent a video to him. The video lasts approximately eight seconds. In this video, MINOR 1 removes his underwear, exposing his erect penis to the camera. The conversation then continued as follows:

Minor 1: *alr now i need to see some of that wet pussy*

Defendant: *mmmm bby lemme see you jerk it*

Minor 1: *pussy first i gotta have something to jerk to*

f. The defendant then sent another picture to MINOR 1. This picture shows a nude female. In the picture, the female is standing in front of the camera while facing away from the camera and bending over slightly at the waist, thus exposing her bare buttocks and vagina to the camera. The female in the picture is standing in front of a mirror, with her

reflection also visible to the camera. The female's reflection shows her bare breasts and her mouth open with her tongue out of her mouth. The conversation then continued as follows:

Defendant: *like this bby*

Minor 1: *yes bby ur so hot*

Defendant: *jerk it bby lemme watch*

g. At the defendant's direction, MINOR 1 sent a video. The video, which lasts approximately seven seconds, shows MINOR 1 using his hand to masturbate his erect penis.

The conversation then continued as follows:

Minor 1: *let me see u finger urself*

Defendant: *mmmmm you're huge bby*

Minor 1: *thank you bby*

u still there?

Defendant: *my mom woke up*

hang on a bit

Minor 1: *just be quiet*

send me something

Defendant: *I am being quiet but i gotta chill*

Minor 1: *nah send something bruh*

Defendant: *bro you want me to get caught on this too haha*

Minor 1: *no but like just be quiet its not hard*

Defendant: *yeah but she can walk in my room any minute to see what i'm doing*

Minor 1: *why would she tho*

Defendant: *bro cuz she's caught me sending before lol*

Minor 1: *ok but like just be quick with it*

listen so u stop if shes coming

Defendant: *bro lol you'll get one more*

Minor 1: *ok*

h. The defendant then sent another picture to MINOR 1. This picture shows a nude female with her breasts and torso exposed. A small portion of the female's face and the top of her pubic area can be seen in the picture. The conversation then continued as follows:

Defendant: *i wanna feel you inside me*

Minor 1: *i wanna be inside of u bby*

Defendant: *me too will you cum in me*

Minor 1: *yes ofc bby*
we should meet up sometime and do it
u make me so horny
Defendant: *that would be hot babe*
Minor 1: *oh yea fs*
Defendant: *you gonna cum*
Minor 1: *i did bc i got on the hub*
since u left
Defendant: *how was it*
Minor 1: *good fs*
Defendant: *is it still there can i see it*
Minor 1: *sure*
Defendant: *ok*

i. At the defendant's direction, MINOR 1 sent another picture. This picture shows a red and blue towel with a white liquid on it, MINOR 1's semen. The conversation then continued as follows:

Defendant: *damn you ever cum on your chest babe*
Minor 1: *yea i have*

3. IP address information for the "misslincon" Kik account, which the defendant used to target MINOR 1, associated the user of the account with both the defendant's place of work in the Eastern District of Virginia and his home in Suffolk. On March 5, 2024, the FBI executed a federal search warrant at that home. They seized, among other things, an iPad Pro [S/N Q63N7DPX24] (hereinafter, "iPad"), which was "Assembled in China" and belonged to the defendant. On this iPad was a folder labeled "Jessica," which contained some of the "Jessica Lincon" images that the defendant used to catfish his victims. Also on this iPad was the Kik application and the above-described chat with MINOR 1, as well as the communications described below in Paragraphs 3 through 37 from late 2021 into 2023.

4. MINOR 2: The defendant also used Instagram and Kik to communicate with MINOR 2 between at least December 31, 2021, and September 19, 2022. The defendant knew

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that MINOR 2 was seventeen years old¹ and lived in California. Nonetheless, he used the Jessica Lincon persona to catfish MINOR 2 to persuade, induce, entice, and coerce MINOR 2 to produce child pornography.

a. For example, on September 16, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 2 as follows:

Defendant: *show me how you fuck*

Minor 2: *How do you want me to do that*

Defendant: *video bby. fuck ur pillow*

[Minor 2 sends an image]

Defendant: *lemme see ur balls bby*

lay back open ur legs

[Minor 2 sends an image showing his naked legs and scrotum.]

Defendant: *can i eat it ass*

[Minor 2 sends an image]

Minor 2: *Let me see your*

Defendant: *jerk it mor bby*

[Minor 2 sends a thumbnail from a video, showing his hand grasping his erect penis.]

5. MINOR 3: The defendant also used Instagram and Kik to communicate with MINOR 3 between at least January 22, 2022, and September 24, 2022. MINOR 3 lived in Illinois. The defendant knew that MINOR 3 was sixteen years old. Nonetheless, he used the Jessica Lincon persona to catfish MINOR 3 to persuade, induce, entice, and coerce MINOR 3 to produce child pornography.

¹ For Minor Victims 2 through 36, the noted age herein is the age when the defendant first successfully sought to have the victim create a sexually explicit depiction of themselves in the Kik communications to which law enforcement has access. Law enforcement determined their true age through victim or family interviews, or other means including identification based on open-source and social media research.

a. For example, on September 24, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 3 as follows:

Defendant: *wyd rn*

Minor 3: *Rubbing my cock*
Imagining you doing it for me

Defendant: *lemme watch*

[Minor 3 sends a media file. The thumbnail shows Minor 3's hand with a ring on his thumb; he is grasping his nude, erect penis.]

Defendant: *too many clothes and the ring is bad lol*

[Minor 3 sends a media file. The thumbnail shows an identical image except that Minor 3's underwear is off, and the ring has been removed.]

6. MINOR 4: The defendant also used Instagram and Kik to communicate with MINOR 4 between at least July 14, 2022, and July 27, 2022. MINOR 4 was seventeen years old and lived in Wisconsin. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 4 to persuade, induce, entice, and coerce MINOR 4 to produce child pornography.

a. For example, on July 27, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 4 as follows:

Defendant: *tbh i wanna see the angle if i was looking up at you while ur balls are in my mouth*

[Minor 4 sends a media file. The thumbnail shows a picture angled up towards Minor 4's face, showing an erect penis, with Minor 4's hand on it.]

Defendant: *look down at me bby*

[Minor 4 sends a media file. The thumbnail shows a picture angled down towards Minor 4's erect penis.]

Minor 4: *I bet you'd be so good at it*

Defendant: *fuck i wanna feel your nuts in my mouth*
should i lick ur ass while i'm down here bby

7. MINOR 5: The defendant also used Instagram and Kik to communicate with MINOR 5 between at least November 21, 2022, and July 5, 2023. MINOR 5 lived in Louisiana.

The defendant knew that MINOR 5 was sixteen years old. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 5 to persuade, induce, entice, and coerce MINOR 5 to produce child pornography.

a. For example, on November 21, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 5 as follows:

Defendant: *lemme see you jerking it bby*

[Minor 5 sends a media file. The thumbnail shows a picture angled down towards Minor 5's erect penis.]

Defendant: *mmm it's so big*
can i see ur balls while u jerk it bby

Minor 5: *i want put all of it in you*

[Minor 5 sends a media file. The thumbnail shows a picture angled down to show Minor 5's hand grasping his erect penis.]

8. MINOR 6: The defendant also used Instagram and Kik to communicate with MINOR 6 between at least August 18, 2022, and August 22, 2022. MINOR 6 was sixteen years old and lived in Louisiana. The defendant knew that MINOR 6 was a minor. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 6 to persuade, induce, entice, and coerce MINOR 6 to produce child pornography.

a. For example, on August 22, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 6 as follows:

Defendant: *soon bby imma need to get wetter but if we move fast and yoh keep doing what i ask you'll be cumming with me*

[Minor 6 sends a media file. The thumbnail shows a picture angled down towards Minor 6's body while Minor 6 is wearing underwear and Minor 6's hand is at the top of his underwear.]

Defendant: *mmm i love ur cock bby*
lemme see ur balls

[Minor 6 sends a media file. The thumbnail shows a picture angled up towards Minor 6's erect penis and scrotum. In the picture, Minor 6's hand is grasping his erect penis.]

Defendant: *lemme watch u porn ur legs and lemme see ur balls and ass while ur laying down*

video bby

Minor 6: *Wym*

Defendant: **open ur legs*

Minor 6: *I'm not following*

[Minor 6 sends a media file. The thumbnail shows a picture angled towards Minor 6's torso and legs, including his erect penis.]

Defendant: *like if you were laying on ur back and i wanted to suck ur balls and ur ass what would be view be like*

[Minor 6 sends a media file. The thumbnail shows a picture with Minor 6 lying on his back. The picture shows Minor 6's torso, legs, and erect penis. Minor 6's hand is on his erect penis in the picture.]

Defendant: *nooo like if i was gonna eat ur ass*

Minor 6: *Un want to see my ass?*

[Minor 6 sends a media file. The thumbnail shows a picture angled up towards Minor 6's face from between his legs, thus exposing Minor 6's scrotum and anus to the camera.]

9. MINOR 7: The defendant also used Instagram and Kik to communicate with MINOR 7 between at least February 22, 2022, and February 24, 2022. MINOR 7 lived in Chesapeake, in the Eastern District of Virginia. The defendant knew MINOR 7 was fifteen years old. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 7 to persuade, induce, entice, and coerce MINOR 7 to produce child pornography.

a. For example, on February 22, 2022, while in Suffolk, in the guise of "misslincon Jessica Lincon" on Kik, the defendant used his iPad to communicate with MINOR 7 as follows:

Defendant: *lemme see u slide ur undies odd all the way abs then rub ur cock*

[Minor 7 sends a media file. The thumbnail shows Minor 7's torso, groin, and legs with his penis partially protruding from his underwear.]

b. The defendant saved the full video in the “2022” folder on his iPad. The full video is 10 seconds long. In it, MINOR 7 pushes his underwear down, exposes his entire penis, and uses his hand to masturbate it. The conversation continued:

Minor 7: *Don't mind my scar on my wrist I broke my arm and had to have a pin sticking out of it*

Defendant: *i love it tbh*

all the way off bby like down ur legs

[Minor 7 sends a media file. The thumbnail shows a picture angled down towards Minor 7's body. The picture shows a portion of Minor 7's erect penis and his scrotum. In the picture, Minor 7's hand appears to be pushing his underwear down towards his feet.]

10. MINOR 8: The defendant also used Instagram and Kik to communicate with MINOR 8 between at least October 28, 2022, and December 4, 2022. MINOR 8 lived in York County, in the Eastern District of Virginia, and was fifteen years old. The defendant knew MINOR 8 was a minor. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 8 to persuade, induce, entice, and coerce MINOR 8 to produce child pornography.

a. For example, on February 22, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 8 as follows:

Defendant: *lemme watch ur undies slide all the way down ur legs and off bby. close up*

Minor 8: *yes bby*

Defendant: *video bby*

[Minor 8 sends a media file. The thumbnail shows a picture angled down towards Minor 8's body. In the picture, Minor 8 is wearing underwear.]

Defendant: *good boy.*

give me a close up tour of ur balls and ass bby

Minor 8: *ofc bby*

Defendant: *good boy*

[Minor 8 sends a media file. The thumbnail shows Minor 8's midsection with his erect penis.]

Minor 8: *the ass angle was pretty hard*

Defendant: *just need to lay on ur back and put ur legs up*

Minor 8: *do you want another video?*

Defendant: *yeah bby*

Minor 8: *ok*

Defendant: *ok*

[Minor 8 sends a media file. The thumbnail shows Minor 8's exposed anus and scrotum.]

Minor 8: *better bby?*

Defendant: *yessss bby*

11. MINOR 9: The defendant also used Instagram and Kik to communicate with MINOR 9 on at least October 3, 2022. MINOR 9 lived in Virginia Beach, in the Eastern District of Virginia. The defendant knew MINOR 9 was sixteen years old. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 9 to persuade, induce, entice, and coerce MINOR 9 to produce child pornography.

a. For example, on October 3, 2022, while in Suffolk, in the guise of "misslincon Jessica Lincon" on Kik, the defendant used his iPad to communicate with MINOR 9 as follows:

Defendant: *lemme see those undies come off and ur legs open for me*

[Minor 9 sends a media file. The thumbnail shows a picture angled down towards Minor 9's body showing his erect penis, which Minor 9 is grasping with his hand.]

b. The defendant saved the full video in the "2022" folder on his iPad. The full video is 15 seconds long. In it, MINOR 9 uses his hand to masturbate his erect penis and to manipulate his testicles while the camera focuses on his genitalia. The conversation continued:

Defendant: *damn babe.*

ur balls full lemme see

[Minor 9 sends a media file. The thumbnail shows a picture angled down towards Minor 9's body showing his erect penis, which Minor 9 is grasping with his hand.]

12. MINOR 10: The defendant also used Instagram and Kik to communicate with MINOR 10 between at least August 16, 2022, and August 20, 2022. MINOR 10 lived in the Commonwealth of Virginia and was seventeen years old. Nonetheless, the defendant used the

Jessica Lincon persona to catfish MINOR 10 to persuade, induce, entice, and coerce MINOR 10 to produce child pornography.

a. For example, on August 18, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 10 as follows:

Defendant: *ok bby. head to toe video of u in bed rn*

[Minor 10 sends a media file. The thumbnail shows a picture, which shows Minor 10's face and the upper portion of his bare chest.]

Defendant: *slower bby. show off*

[Minor 10 sends a media file. The thumbnail shows a picture, which shows Minor 10's face and the upper portion of his bare chest.]

Defendant: *mmm good boy*

lemme watch you open ur legs and play with ur balls

[Minor 10 sends a media file. The thumbnail shows a picture angled towards Minor 10's nude body as Minor 10 appears to be sitting on his bed. The picture shows Minor 10's erect penis.]

Defendant: *lay back bby lemme see ur balls and ass :)*

Minor 10: *I'm gonna be straight with you*

Defendant: *ok*

Minor 10: *It is an untamed forest*

Defendant: *idc bby i want go explore*

Minor 10: *Lol*

Ok

Defendant: *ok bby*

[Minor 10 sends a media file. The thumbnail shows a picture angled towards Minor 10's bare buttocks. The picture shows Minor 10's anus, scrotum, and penis.]

Defendant: *fuck i want finger u while i blow you*

13. MINOR 11: The defendant also used Instagram and Kik to communicate with MINOR 11 on at least November 29, 2022. MINOR 11 lived in York County, in the Eastern District of Virginia, and was sixteen years old; the defendant knew MINOR 11 was a minor. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 11 to persuade, induce, entice, and coerce MINOR 11 to produce child pornography.

a. For example, on November 29, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 11 as follows:

Defendant: *tbh i like soft
to start*

Minor 11: *u sure?*

Defendant: *yeah if you are bby
tbh if i was there i'd just straddle you while you pulled them down and let
my web pussy sit right on it*

[Minor 11 sends a media file. The thumbnail shows a picture of Minor 11's penis.]

Minor 11: *soft lol*

Defendant: *it's nice tbh
lemme see a fuck vid*

[Minor 11 sends a media file. The thumbnail shows a picture angled towards Minor 11's body, including his penis, which Minor 11 is touching with his hand.]

[Defendant sends a media file showing “misslincon” naked from the collarbone through pubic area.]

Defendant: *hurry it's late af lol*

Minor 11: *wow u have nice tits*

Defendant: *wish you'd cum on them*

[Minor 11 sends a media file. The thumbnail shows a picture that appears to depict a female's back and buttocks as a male penetrates her from behind.]

Minor 11: *should send some vids*

Defendant: *i wanna ride you like that
hard now?*

Minor 11: *idkkk not quite
could use a little more help*

Defendant: *show me daddy*

[Minor 11 sends a media file. The thumbnail shows a picture of Minor 11's erect penis, which Minor 11 is grasping with his hand.]

14. MINORS 12 & 13: The defendant also used Instagram and Kik to communicate with MINOR 12 between at least July 11, 2022, and November 17, 2022. MINOR 12 was seventeen years old and lived in Maryland; the defendant knew MINOR 12 was a minor.

Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 12 to attempt persuade, induce, entice, and coerce MINOR 12 to produce child pornography.

a. For example, on November 17, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 12 as follows:

Defendant: *lemme see ur undies rn*
Minor 12: *I'm not even in my room nothing rn*
Defendant: *so what lol you by yourself right*
Minor 12: *Lls nah I'm in the living my lil brother on the floor*
Defendant: *how old is he*
Minor 12: *13lls*
Defendant: *shot y'all want tag team me lol*
Minor 12: *with whatever having you crawling*
Have
Defendant: *he horny too fr fr?*
Minor 12: *Huh?*
Defendant: *your bro*
you and him can tag team me
Minor 12: *He with whatever I already know*
Defendant: *what lol*
does he have kik or insta lol
Minor 12: *Lls no*
Defendant: *well if you both wanna see me we can maybe arrange something*
Minor 12: *I'm with it*
Defendant: *ok take a pic of him rq*
Minor 12: *Ngl he slump*
Defendant: *lemme see haha*
Minor 12: *he looks wild*
Defendant: *lol ok*
[Minor 12 sends an image of his younger brother, Minor 13, who appears to be asleep with his mouth open.]
Defendant: *is he drooling lol*
Minor 12: *Idek*
Defendant: *you should put your d² on his forehead lol*

² [“d” stands for dick.]

Minor 12: *Noooo*

Defendant: *i'll show u sum if you do*

15. MINOR 14: The defendant also used Instagram and Kik to communicate with MINOR 14 between at least July 25, 2022, and August 19, 2022. MINOR 14 was sixteen years old and lived in New Jersey. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 14 to persuade, induce, entice, and coerce MINOR 14 to produce child pornography.

a. For example, on July 25, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 14 as follows:

Defendant: *so hot*

u rubbing bby

Minor 14: *Ofc mommy*

Defendant: *lemme watch bby*

[Minor 14 sends a media file. The thumbnail shows a picture angled down towards Minor 14's body, including Minor 14's erect penis, which Minor 14 is grasping with his hand.]

Defendant: *ur so big*

lemme see ur balls while u rub it

[Minor 14 sends a media file. The thumbnail shows a picture angled down towards Minor 14's body, including Minor 14's erect penis, which Minor 14 is grasping with his hand.]

Defendant: *open ur legs bby*

you got precum?

Minor 14: *Nope*

Send me something to stroke too mommy

Defendant: *like ass babe?*

Minor 14: *Love ass*

[Minor 14 sends a media file. The thumbnail shows a picture angled down towards Minor 14's body, including Minor 14's erect penis, which Minor 14 is grasping with his hand.]

Defendant: *touch mind bby*

will u rub it hole for me bby

Minor 14: *What does that mean*

Defendant: *rub ur hole*

Minor 14: *Idk how I can get that on camera*

Defendant: *just like you were doing just put ur fingers there*

[Minor 14 sends a media file. The thumbnail shows a picture angled down towards Minor 14's body, including Minor 14's erect penis, which Minor 14 is grasping with his hand.]

Defendant: *mmmm*

csn i lick ur ass

Minor 14: *Of course mommy*

Defendant: *lemme see ur arms chest and pits bby*

[Minor 14 sends a media file. The thumbnail shows a picture of Minor 14's bare torso and a portion of his arm.]

Minor 14: *Can I see your tits mommy*

Defendant: *on my back for you bby*

Minor 14: *So hot*

What do you want me to do now

Defendant: *csn i see you like the angle if i was looking up at you while i sucked ur cock*

[Minor 14 sends a media file. The thumbnail shows a picture angled up towards Minor 14's face. The picture shows Minor 14's torso and face, which Minor 14 is partially covering with his hand.]

Defendant: *while ur jerking laying down*

[Minor 14 sends a media file. The thumbnail shows a picture angled up towards Minor 14's face while Minor 14 appears to be lying in a bed. The picture shows Minor 14's torso and face, which Minor 14 is partially covering with his hand.]

Defendant: *you're so hot bby*

16. MINOR 15: The defendant also used Instagram and Kik to communicate with MINOR 15 between at least July 5, 2022, and August 25, 2022. MINOR 15 lived in Virginia Beach, Virginia, and was seventeen years old. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 15 to persuade, induce, entice, and coerce MINOR 15 to produce child pornography.

a. For example, on July 5, 2022, while in Suffolk, in the guise of "misslincon Jessica Lincon" on Kik, the defendant used his iPad to communicate with MINOR 15 as follows:

Defendant: *rub ur bulge bby*

Minor 15: *Mmm*

Defendant: *mmmm bby*

[Minor 15 sends a media file. The thumbnail shows a picture of Minor 15's torso. In the picture, Minor 15 is wearing underwear.]

Defendant: *lemme watch you strip bby*

[Minor 15 sends a media file. The thumbnail shows a picture of Minor 15 in which a portion of Minor 15's face and chest can be seen.]

Defendant: *rub that big cock*

[Minor 15 sends a media file. The thumbnail shows a picture angled up towards Minor 15's face. The picture shows Minor 15's hand on his exposed penis.]

Defendant: *mmmm precum lemme see*

[Minor 15 sends a media file. The thumbnail shows a picture angled up towards Minor 15's face. The picture also shows Minor 15's penis.]

Minor 15: *You gotta give me props for that*

Defendant: *good boy. how was it*

b. On July 11, 2022, the conversation with MINOR 15 continued:

Defendant: *show off bby*

Minor 15: *Show what off*

Defendant: *your huge cock*

[Minor 15 sends a media file. The thumbnail shows a picture that depicts Minor 15's bare torso and his pubic area, which he is covering with his hand.]

Defendant: *rub it bby*

[Minor 15 sends a media file. The thumbnail shows a picture angled down towards Minor 15's nude body, including Minor 15's hand grasping his erect penis.]

Minor 15: *I at least want some vids too bby*

Defendant: *if my mom sleeps soon*

Minor 15: *ok bby*

What do u want me to do

Defendant: *lemme get a tour of ur balls and ass baby*

Minor 15: *No ass but just balls*

[Minor 15 sends a media file. The thumbnail shows a picture angled up from Minor 15's pubic area towards his face. The picture shows Minor 15's erect penis and his scrotum.]

Defendant: *open ur legs lemme see them hang*

[Minor 15 sends a media file. The thumbnail shows a picture angled towards Minor 15's pubic area, including Minor 15's hand on his erect penis and his scrotum.]

Defendant: *lemme see all ur precum*

Minor 15: *I don't have any yet*

You need to make me hornier

[Defendant sends an image file. The thumbnail shows a picture of a female with her nude breasts exposed.]

Minor 15: *They're not small lol*
They make me horny

Defendant: *how so bby*

Minor 15: *I wanna put my cock in between them*

Defendant: *mmmmm then cum on my face*

Minor 15: *Mmm yes please*
I'm so hard

[Minor 15 sends a media file. The thumbnail shows a picture of Minor 15's hand on his erect penis.]

17. MINOR 16: The defendant also used Instagram and Kik to communicate with MINOR 16 between at least October 7, 2022, and October 21, 2022. MINOR 16 was sixteen years old and lived in North Carolina. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 16 to persuade, induce, entice, and coerce MINOR 16 to produce child pornography.

a. For example, on October 7, 2022, while in Suffolk, in the guise of "misslincon Jessica Lincon" on Kik, the defendant used his iPad to communicate with MINOR 16 as follows:

Defendant: *are you even horny*
Lol

Minor 16: *so horny*

Defendant: *lol how so*

Minor 16: *u want pics?*

Defendant: *i mean last pic i got wasn't anything crazy but like idk want random dick pics*

i kinds like being teased haha

[Minor 16 sends a media image. The thumbnail shows a picture angled down towards Minor 16's bare torso. In the picture, Minor 16 is using his hand to cover his pubic area.]

Defendant: *fuck*
it looks huge
what's your body count

Minor 16: *2 hbu*
send me smth pls u got me so horny

Defendant: *lol how do i have you so horny i haven't done anything haha*

what's ur abs be looking like tho
[Minor 16 sends a media image. The thumbnail shows a picture angled down towards Minor 16's body in which a portion of Minor 16's face, torso, and erect penis can be seen. In the picture, Minor 16's hand is on his erect penis.]

18. MINOR 17: The defendant also used Instagram and Kik to communicate with MINOR 17 between at least May 31, 2022, and October 31, 2022. MINOR 17 was fourteen years old and lived in Maryland; the defendant knew MINOR 17 was a minor. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 17 to persuade, induce, entice, and coerce MINOR 17 to produce child pornography.

a. For example, on May 31, 2022, while in Suffolk, in the guise of "misslincon Jessica Lincon" on Kik, the defendant used his iPad to communicate with MINOR 17 as follows:

Defendant: *you keep your shirt off??*

Minor 17: *yea*

Defendant: *good lemme see those shorts come off. leave undies on*

[Minor 17 sends a media file. The thumbnail shows a picture of Minor 17's torso and underwear, which Minor 17 is wearing.]

Defendant: *damn that bulge is huge*
rub it

[Minor 17 sends a media file. The thumbnail shows a picture of Minor 17's underwear with Minor 17's hand touching his penis over his underwear.]

Minor 17: *u like that ? imagine that in u*

Defendant: *i want it to slide in me slowly*
open me up

Minor 17: *oh yea*

Defendant: *lemme watch those come off bby*

[Minor 17 sends a media file. The thumbnail shows a picture of Minor 17's torso and underwear, which Minor 17 is wearing.]

Defendant: *i wanna watch u get naked bby*

Minor 17: *ok i wanna see ur panties and bra*

[Minor 17 sends a media file. The thumbnail shows a picture of Minor 17's underwear, which Minor 17 is wearing.]

Defendant: *like a nice ass short or sum*

Minor 17: *yea*

Defendant: *hmm*
might be too much for you

Minor 17: *omg*
that ass is so nice
fuck me
i'm so fucking horny and hard

Defendant: *show me bby.*
give me a naked tour of ur body

[Minor 17 sends a media file. The thumbnail shows a picture angled down towards Minor 17's pubic area. The picture shows Minor 17's hand on his erect penis.]

Minor 17: *u like that?*

Defendant: *yes bby but i want a tour of ur balls and ass and big cock baby*

[Minor 17 sends a media file.]

Minor 17: *yea u like that shit*

Defendant: *yeah daddy i do lose the undies open ur legs for mommy*

[Minor 17 sends a media file. The thumbnail shows a picture angled up towards Minor 17's face from his pubic area. The picture shows Minor 17's scrotum and erect penis, which Minor 17 is grasping with his hand.]

Minor 17: *i love it when u call me daddy*
lemme see those tities

Defendant: *soon daddy do thst view again and tell me how you like my tongue on your balls*

[Minor 17 sends a media file. The thumbnail shows a picture angled up towards Minor 17's face from his pubic area. The picture shows Minor 17's scrotum and erect penis, which Minor 17 is grasping with his hand.]

Minor 17: *i want u all up in there*

Defendant: *can you say it in the video daddy*

Minor 17: *say what*

Defendant: *tell me you want me all up in there*
do you want my tongue inside you too

[Minor 17 sends a media file. The thumbnail shows a picture angled up towards Minor 17's face from his pubic area. The picture shows Minor 17's scrotum and erect penis, which Minor 17 is grasping with his hand.]

Defendant: *open ur legs lemme see what you want me to lick*

[Minor 17 sends a media file. The thumbnail shows a picture angled up towards Minor 17's face from his pubic area. The picture shows Minor 17's scrotum and erect penis.]

Minor 17: *right there baby*

Defendant: *ohhh you wanna finger a little daddy*
ever tried

Minor 17: *no*

not tryna do that tbh

Defendant: *hmmm i wanna see how you'd fuck me
on video*

Minor 17: *ok*

[Minor 17 sends a media file. The thumbnail shows a picture angled towards Minor 17's nude body as he is on his knees facing towards the camera. The picture shows Minor 17's erect penis.]

Minor 17: *i put u in doggy and pound u*

Defendant: *longer video bby show off*

[Minor 17 sends a media file. The thumbnail shows a picture angled towards Minor 17's nude body as he is on his knees facing towards the camera. The picture shows Minor 17's erect penis.]

Defendant: *can you ride the camera in thst angle daddy*

[Minor 17 sends a media file. The thumbnail shows a picture angled towards Minor 17's body. The picture shows Minor 17's erect penis.]

Defendant: *lower bby straddle the camera*

Minor 17: *idk how*

Defendant: *you can like record from main camera so yoh don't have to hold the button*

19. MINOR 18: The defendant also used Instagram and Kik to communicate with MINOR 18 between at least May 12, 2022, and October 18, 2022. MINOR 18 was sixteen years old and lived in Pennsylvania; the defendant knew that MINOR 18 was sixteen years old. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 18 to persuade, induce, entice, and coerce MINOR 18 to produce child pornography.

a. For example, on May 23, 2022, while in Suffolk, in the guise of "misslincon Jessica Lincon" on Kik, the defendant used his iPad to communicate with MINOR 18 as follows:

Defendant: *you tryna cuddle me*

Minor 18: *definitely*

Defendant: *lemme see ur shorts
??*

Minor 18: *bet*

[Minor 18 sends a media file. The thumbnail shows a picture of the bottom of Minor 18's shirt and the top of his pants.]

Defendant: *can you take them off bby*
i'll show more if you do

[Minor 18 sends a media file. The thumbnail shows a picture of the bottom of Minor 18's shirt and the top of his underwear.]

Defendant: *i wanna suck you*
[Defendant sends a media file.]

[Minor 18 sends a media file. The thumbnail shows a picture of Minor 18's hand on his penis over his underwear, which Minor 18 is wearing.]

Minor 18: *goddamnnnn*

Defendant: *rub it lemme watch*

[Minor 18 sends a media file. The thumbnail shows a picture Minor 18's hand on his penis over his underwear, which Minor 18 is wearing.]

Defendant: *it looks huge*

Minor 18: *send a vid of u running ur hands down ur body*

Defendant: *maybe if you get me wetter*

Minor 18: *hmm ok*

Defendant: *you down*

Minor 18: *yeah*

Defendant: *ok csn i see you take ur shirt off*

[Minor 18 sends a media file. The thumbnail shows a picture angled towards Minor 18's body. The picture shows a portion of Minor 18's bare torso.]

Defendant: *oh what's going on there*

Minor 18: *take a guess*

Defendant: *idk show me*

[Minor 18 sends a media file. The thumbnail shows a picture of Minor 18's erect penis, which Minor 18 is grasping with his hand.]

Defendant: *fuck it's huge. jerk it bby*

[Minor 18 sends a media file. The thumbnail shows a picture of Minor 18's erect penis, which Minor 18 is grasping with his hand.]

Defendant: *why your undies on you can't fuck me with those bbu*
[Defendant sends a media file.]

20. MINOR 19: The defendant also used Instagram and Kik to communicate with MINOR 19 between at least March 27, 2022, and April 25, 2022. MINOR 19 was seventeen years old and lived in Puerto Rico; the defendant knew MINOR 19 was a minor. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 19 to persuade, induce, entice, and coerce MINOR 19 to produce child pornography.

a. For example, on February 4, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 19 as follows:

Minor 19: *It's super hot*

Defendant: *prove it then*

rn

Minor 19: *Wym how*

Defendant: *your last chance*

Minor 19: *K*

Defendant: *how it makes u fell*

Minor 19: *Wym*

U want me to prove to u that it's hot it is BBy I sry I said that what u want me to do to prove it

Defendant: *show me what ur doing to it*

[Minor 19 sends a media file. The thumbnail shows a picture of Minor 19's erect penis, which Minor 19 is grasping with his hand.]

21. MINOR 20: The defendant also used Instagram and Kik to communicate with MINOR 20 between at least December 10, 2021, and December 13, 2021. MINOR 20 was sixteen years old and lived in Florida; the defendant knew MINOR 20 was a minor. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 20 to persuade, induce, entice, and coerce MINOR 20 to produce child pornography.

a. For example, on February 4, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 20 as follows:

Defendant: *Can I watch u jerk it daddy*

Minor 20: *he returned the favor*

Defendant: *Nice where did you bust*

[Minor 20 sends a media file. The thumbnail shows a picture of Minor 20's erect penis, which Minor 20 is grasping with his hand.]

22. MINOR 21: The defendant also used Instagram and Kik to communicate with MINOR 21 between at least February 14, 2022, and September 7, 2022. MINOR 21 was seventeen years old and lived in Chesapeake; the defendant knew MINOR 21 was a minor. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 21 to persuade, induce, entice, and coerce MINOR 21 to produce child pornography.

a. For example, on February 14, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 21 as follows:

Defendant: *lemme watch u slide ur undies down all the way off ur feet*
[Minor 21 sends a media file. The thumbnail shows a picture of Minor 21's underwear, which Minor 21 is wearing.]

Defendant: *fuck it's super big*
and i wanted to see them come of ur feet babe

Minor 21: *That's the best I can do for now*

Defendant: *how lol*

Minor 21: *Let me redo it then*

Defendant: *ok*

[Minor 21 sends a media file. The thumbnail shows a picture of Minor 21's underwear, which Minor 21 is wearing.]

Minor 21: *That better?*

Defendant: *fuck yesssd*
love seeing your legs spread too
so i could lay down in between them and lick ur balls

Defendant: *head to toe video of u rn and then we can start fucking hard babe*
[Minor 21 sends a media file. The thumbnail shows a picture of Minor 21's bare leg.]

Minor 21: *That?*

Defendant: *shirt off lemme watch you strip*

[Minor 21 sends a media file. The thumbnail shows a picture of Minor 21's bare legs and feet.]

Defendant: *tbh i want watch ur face while u jerk it babe*

Minor 21: *Let me see yours first*

Defendant: *open me up*

Minor 21: *Fuck*

Defendant: *you wanna fuck me*

Minor 21: *I do I want to hear you moan so badly*
 Defendant: *soon bby*
 [Minor 21 sends a media file. The thumbnail shows a picture that, although very dark, appears to show Minor 21's face.]
 Defendant: *it's so dark lol*
 Minor 21: *Want me to do it again?*
 Defendant: *yes bby*
 [Minor 21 sends a media file. The thumbnail shows a picture of Minor 21's face.]
 Defendant: *you close*
 Minor 21: *No I just keep thinking about your pussy or your mouth*
 Defendant: *tbh i want to ride you till you cum in me*
 Minor 21: *Can we start sending videos and stuff now?*
 Defendant: *hmm can you put the camera at ur feet so i can watch ur balls bounce while u jerk it babe*
 [Minor 21 sends a media file. The thumbnail shows a picture angled towards Minor 21's pubic area. The picture shows Minor 21's erect penis, which Minor 21 is grasping with his hand.]

b. The defendant saved the full video in the "2022" folder on his iPad. The full video is 8 seconds long. In it, MINOR 21 uses his hand to masturbate his erect penis. The conversation continued:

Defendant: *no i meant at your feet looking up at u lol*
 Minor 21: *I'm not that flexible so can you pick anything that involves me not doing anything with my feet?*
 Defendant: *no like see how my pic was?*
how the camera was pointed at me but not all up on me
you in the same angle but jerking ur cock ahha
 [Minor 21 sends a media file. The thumbnail shows a picture angled up towards Minor 21's face from his pubic area. The picture shows Minor 21's scrotum and erect penis, which Minor 21 is grasping with his hand.]
 Defendant: *yessss*

23. MINOR 22: The defendant also used Instagram and Kik to communicate with MINOR 22 for nearly a year and a half, between at least March 10, 2022, and August 20, 2023. MINOR 22 was sixteen years old and lived in Arizona; the defendant knew MINOR 22 was

sixteen years old. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 22 to persuade, induce, entice, and coerce MINOR 22 to produce child pornography.

a. For example, on May 18, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 22 as follows:

Defendant: *need to be entertained*
Minor 22: *Haha, I feel you*
What you want?
Defendant: *you just to fuck the shit out of me*
Minor 22: *Straight to the point, I like it*
Defendant: **opens legs**
it's all yours giant
Minor 22: *What you wearing bby*
Defendant: *just panties but they're coming off tbh*
Minor 22: *Good*
Defendant: *wait so you still got some videos huh³*
Minor 22: *Wym*
Defendant: *videos you jags lol*
made
Minor 22: *Yea*
Defendant: *you tryna help me cum fr fr*
Minor 22: *You tryna help mE cum?*
Defendant: *i mean if you get me there you know how my pussy works*
Minor 22: *A little*
We'll see bby
Defendant: *i don't have long so idk lol it's late*
what you got on
Minor 22: *Everything, I just got to my bathroom*
...
Defendant: *wyd in the bathroom*
Minor 22: *I mean, nothin yet*
Defendant: *well you just standing there*
Minor 22: *Tbh I was just looking at myself haha*
Defendant: *lemme see what you see bby*

³ [Minor 22 had previously mentioned having recordings of him and his girlfriend having sex.]

[Minor 22 sends a media file. The thumbnail shows a picture of Minor 22 standing in front of the camera and lifting his shirt to expose his torso.]

Defendant: fuckkk

i wanna lick all of that

Minor 22: Haha, go on

Lick my abs bby

Defendant: mmmmm

licks abs and ab hair

Minor 22: Lower

Defendant: *goes lower*

pulls shorts down

licks right above the base

Minor 22: Mmm

Defendant: licks your thighs

mmmm bby

[Minor 22 sends a media file. The thumbnail shows a picture of Minor 22 standing in front of the camera and lifting his shirt to expose his torso.]

Defendant: i wanna feel your cock on my face

you can just take regular pics don't have to pose lol

[Minor 22 sends a media file. The thumbnail shows a picture angled up towards Minor 22's face from his pubic area. The picture shows Minor 22's erect penis, which Minor 22 is touching with his hand.]

More fun if I pose

Defendant: i wanna smell your nuts on my face

is that weird lmaoooo

Minor 22: Mm, a little but people are into certain stuff

Defendant: idk i just want crazy dirty stuff for some reason

Minor 22: I feel you fr

b. On May 23, 2022, while in Suffolk, in the guise of "misslincon Jessica

Lincon" on Kik, the defendant used his iPad to communicate with MINOR 22 as follows:

Defendant: show me how you'd fuck my face

[Minor 22 sends a media file. The thumbnail shows a picture of Minor 22's bare torso.]

Defendant: god yes bby

look down at me while u do it

[Minor 22 sends a media file. The thumbnail shows a picture angled up towards Minor 22's face. The picture shows Minor 22's bare torso and his face.]

You gonna send for me

Defendant: csn i see you fuckin

...

Minor 22: *You want this dick b*

Defendant: *yes show me*

[Minor 22 sends a media file. The thumbnail shows a picture of Minor 22 while he appears to be sitting on a toilet. In the picture, Minor 22 is nude and is grasping his erect penis with his hand.]

24. MINOR 23: The defendant also used Instagram and Kik to communicate with MINOR 23 for nearly a year and a half, between at least December 10, 2021, and February 17, 2022. MINOR 22 was sixteen years old and lived in Hawaii; the defendant knew MINOR 23 was a minor. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 23 to persuade, induce, entice, and coerce MINOR 23 to produce child pornography.

a. For example, on December 13, 2021, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 23 as follows:

Defendant: *Lol when's the last time you got laid*

Minor 23: *summer i don't really have many options when it comes to Hawaii*

Defendant: *Why's that*

Minor 23: *eh not interested in people here can barely make like friends*

Defendant: *I'm sorry b*

Lemme come to Hawaii so we can chill

Minor 23: *i dropped out of in person just do online school and i've never been happier and yeah fs we've got like uhhhh . . . the ocean . . . and drugs*

Defendant: *You can fuck me too if you want lol*

Minor 23: *sounds like fun*

Defendant: *Fr it's been a bit for me*

I'm bout to go to the hub lol

Minor 23: *i was about to take a fun shower myself*

Defendant: *Oh fr*

Should just stay in your bed lol

Minor 23: *well yeah but the fl[a]shlight is fun in the shower
u remember i have one?*

Defendant: *Nooo*

Do u fuck it

Minor 23: *noooo*

26
BW ERG
[Signature]

definitely not

Defendant: *Lol lemme see*

Minor 23: *well i'm not fucking it this second*

Defendant: *Lol u even hard*

Minor 23: *hard but in need of motivation still*

Defendant: *Motivate me sum and I'll help*

Minor 23: *what you want from me i'll give you anything*

Defendant: *Fr like rn*

Lemme sexy head to toe in undies bby

*See**

[Minor 23 sends a media file. The thumbnail shows a picture of Minor 23 standing in a bathroom while wearing underwear.]

miss this?

Defendant: *Fuck yes*

Rub it bby help me cum

[Minor 23 sends a media file. The thumbnail shows a picture of Minor 23 standing in a bathroom while wearing underwear. In the picture, Minor 23 is grasping his erect penis over top of his underwear.]

i like being baby but i love being ...

Defendant: *It's so big daddy*

Minor 23: *guess he missed you*

i'm gonna go back in my room so less interesting camera angles for now

Defendant: *I love bedroom views*

Hate mirror ones lol

Minor 23: *it's almost a guy pov in my bedroom*

Defendant: *Show me*

Minor 23: *changing my lights cause ik u care*

Defendant: *Lol*

[Minor 23 sends a media file. The thumbnail shows a picture of Minor 23's erect penis, which Minor 23 is grasping with his hand.]

i'm very horny

Defendant: *Fuckkk it's so thick*

Lemme see the full d bby

Minor 23: *haven't shaved in a while don't expect prettyness*

i was gonna wait for you to say something like "idc just send it" but I'm horny so u don't get the option

Defendant: *Idc just send it*

Lol

[Minor 23 sends a media file. The thumbnail shows a picture of Minor 23's erect penis, which Minor 23 is grasping with his hand.]

25. MINOR 24: The defendant also used Instagram and Kik to communicate with MINOR 24 between at least February 20 and February 22, 2022. MINOR 24 was seventeen years old and lived in Illinois. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 24 to persuade, induce, entice, and coerce MINOR 24 to produce child pornography.

a. For example, on February 20, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 24 as follows:

Minor 24: *Lol nah I'm straight. I'm hella hard rn tho*

Defendant: *prove it lol lemme see your undies
and damn if you were lowkey bi i'd be so down haha*

[Minor 24 sends a media file. The thumbnail shows a picture of Minor 24's underwear.]

Defendant: *can i see u rub it*

Minor 24: *Outside the boxers or inside*

Defendant: *inside*

[Minor 24 sends a media file. The thumbnail shows a picture of Minor 24's hand inside his underwear.]

Defendant: *should take those off but in video*

...

Minor 24: *Every time I try to take a video, it says "call in progress"*

Defendant: *do it from ur regular cam like save to camera roll*

Minor 24: *Ok*

Defendant: *ok*

[Minor 24 sends a media file. The thumbnail shows a picture of Minor 24's underwear.]

Defendant: *strip bby*

Minor 24: *Just take my boxers off?*

Defendant: *all of it bby in video*

Minor 24: *I dont do that on video. What am I getting out of this, anyway?*

Defendant: *you can see me masturbate but why don't you do it*

Minor 24: *I just don't feel comfortable doing it*

Defendant: *oh then what do you like to do*

Minor 24: *Just pictures, unless I'm sending videos of me masturbating*

Defendant: *well lemme watch u take ur undies off
so we can do that*

Minor 24: *Ok*

[Minor 24 sends a media file. The thumbnail shows a picture of Minor 24's underwear.]

Defendant: *damn it's big.
i wanna eat ur ass*

...

Defendant: *if you do head to toe video in bed i'll show you me in my bed naked*
[Minor 24 sends a media file. The thumbnail shows a picture of Minor 24's face and bare chest.]

Defendant: *awe your cock isn't out i wanna ride it*
[Minor 24 sends a media file. The thumbnail shows a picture of Minor 24's face and bare chest.]

How's that?

Defendant: *it's so big bby i wanna ride you
raw too
like i wanna feel it in me*

Minor 24: *U said I would get something*

Defendant: *hold on*

Minor 24: *Ok :)*

Defendant: *:)*

Minor 24: *Ooo fuck*

[Minor 24 sends a media file. The thumbnail shows a picture of Minor 24's erect penis, which Minor 24 is grasping with his hand.]

26. MINOR 25: The defendant also used Instagram and Kik to communicate with MINOR 25 for over a year and a half, between at least January 17, 2022, and November 16, 2023. MINOR 25 was seventeen years old and lived in Virginia Beach, Virginia; the defendant knew MINOR 25 was a minor. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 25 to persuade, induce, entice, and coerce MINOR 25 to produce child pornography.

a. For example, on February 14, 2022, while in Suffolk, in the guise of "misslincon Jessica Lincon" on Kik, the defendant used his iPad to communicate with MINOR 25 as follows:

Defendant: *show me how hard you are.*

[Minor 25 sends a media file. The thumbnail shows a picture of Minor 25's erect penis.]

Defendant: *jerk bby lemme watch*

[Minor 25 sends a media file. The thumbnail shows a picture of Minor 25's erect penis, which Minor 25 is grasping with his hand.]

Defendant: *point it up bby lose the blanket*

Minor 25: *It's cold*

And it hurts going up

Defendant: *how bby*

Minor 25: *It's meant to go up rather than straight*

Defendant: *you gonna cum on your chest*

Minor 25: *Ye*

I'll take a pic

Don't worry

Defendant: *no i wanna watch u cum babe*

[Minor 25 sends a media file. The thumbnail shows a picture of Minor 25's erect penis, which Minor 25 is grasping with his hand. The picture shows semen coming out of Minor 25's penis.]

Defendant: *you ever taste it*

Minor 25: *Yep*

Very tart

Defendant: *csn i watch u taste it bby*

Minor 25: *I cleaned it*

Defendant: *damn*

Minor 25: *Yea*

Defendant: *next time you cum lemme watch and i'll show u me using a toy*

b. In a chat on March 14, 2022, the defendant falsely referenced his teacher being “dumb” and having a day off the following week for a “teacher workshop day.” The conversation continued into the early morning of March 15, 2022, and MINOR 25 said he needed to go to bed soon because he had a SOL (Standards of Learning) test the following morning.

27. MINOR 26: The defendant also used Instagram and Kik to communicate with MINOR 26 between at least February 4, 2022, and August 15, 2022. MINOR 26 was fourteen

years old and lived in Florida; the defendant knew MINOR 26 was a minor. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 26 to persuade, induce, entice, and coerce MINOR 26 to produce child pornography.

a. For example, on August 8, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 26 as follows:

Defendant: *ok well want me to role play and talk about fucking your ass*

Minor 26: *i want to do what will get you off*

Defendant: *thst will tbh*

lots of ass play

got any toys

Minor 26: *unfortunately no*

maybe

idk actually

Defendant: *what you got*

Minor 26: *not toys but stuff i could use as a toy*

Defendant: *like what show me*

Minor 26: *idk i'm trying to think about what i have*

Defendant: *brushes maybe*

Minor 26: *i have brushes*

Defendant: *lemme see*

[Minor 26 sends a media image. The thumbnail shows a picture of two brushes, one of which has a brown handle.]

Defendant: *you wanna try one*

Minor 26: *i wanna do what will get you off*

Defendant: *i wanna fuck you sawyer*

Minor 26: *okay mommy*

which brush should i use

Defendant: *brown*

lemme watch you slide it in

Minor 26: *okay*

Defendant: *what you using for lube*

Minor 26: *lotion*

Defendant: *lemme see you prep*

Minor 26: *oh i just did*

Defendant: *csn i see*

26
BW ERG
e

[Minor 26 sends a media image. The thumbnail shows a picture of the brown brush's handle, which has lotion on it.]

Defendant: *like ur ass bby*
you need some there

Minor 26: *oh*

Defendant: *yeah bby*

[Minor 26 sends a media image. The thumbnail shows a picture of Minor 26's anus, which has lotion on it. Minor 26's scrotum is also shown in the picture.]

Defendant: *mmmm yes bby*

Minor 26: *should i stick it in*

Defendant: *yes lemme watch*

[Minor 26 sends a media image. The thumbnail shows a picture of Minor 26 inserting the brush handle into his anus. Minor 26's scrotum is also shown in the picture.]

Defendant: *how is it*

Minor 26: *good*

Defendant: *you hard*

Minor 26: *a little*

Defendant: *lemme watch you fuck urself*

[Minor 26 sends a media image. The thumbnail shows a picture of Minor 26 inserting the brush handle into his anus. Minor 26's scrotum is also shown in the picture.]

Defendant: *do a body video while ur doing that*

28. MINOR 27: The defendant also used Instagram and Kik to communicate with MINOR 27 between at least November 17, 2022, and December 18, 2022. MINOR 27 was sixteen years old and lived in New Jersey; the defendant knew MINOR 27 was a minor. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 27 to persuade, induce, entice, and coerce MINOR 27 to produce child pornography.

a. For example, on November 17, 2022, while in Suffolk, in the guise of "misslincon Jessica Lincon" on Kik, the defendant used his iPad to communicate with MINOR 27 as follows:

Defendant: *rub ur bulge bby*

Minor 27: *Ok*

Defendant: *lemme watch*

[Minor 27 sends a media image. The thumbnail shows a picture of Minor 27's underwear. In the picture, Minor 27 is grasping his erect penis over top of his underwear.]

Defendant: *you wanna stip bby*

Minor 27: *Sure*

Defendant: *lemme watch u strip laying down b*

[Minor 27 sends a media image. The thumbnail shows a picture of Minor 27's underwear.]

Defendant: *it's so big bby. show off for mommy*

Minor 27: *Sure thing for a pic you rn*

Defendant: *you like tiddies*

Minor 27: *Yes I do*

Is that a pic of you this moment?

Defendant: *wanna titty fuck me*

Minor 27: *Yes*

Defendant: *no cuz my moms uo still*

Minor 27: *Damn*

I'd like to get one of those soon

[Minor 27 sends a media image. The thumbnail shows a picture of Minor 27's erect penis, which Minor 27 is grasping with his hand.]

Defendant: *duck it's so big*

lemme see ur balls and ass bby while ur laying down

Minor 27: *Ok*

Defendant: *ok bby*

Minor 27: *The ass or the hole?*

Defendant: *hold bby*

Hole

[Minor 27 sends a media image. The thumbnail shows a picture of Minor 27's scrotum and erect penis.]

Defendant: *jerk your cock bby i wanna cum with you*

[Minor 27 sends a media image. The thumbnail shows a picture of Minor 27's erect penis, which Minor 27 is grasping with his hand.]

Defendant: *how much pre cum you got bby*

Minor 27: *A lot*

Defendant: *show me*

Minor 27: *I just wiped it off*

Defendant: *damn*

Minor 27: *Are there any more reward you have for me*

Defendant: *soon bby.*

give me a good head to toe sexy video bby

[Minor 27 sends a media image. The thumbnail shows a picture of Minor 27's face and bare chest.]

Defendant: *lay in bed bby and do it*

[Minor 27 sends a media image. The thumbnail shows a picture of Minor 27's face and bare chest.]

Defendant: *i wanna ride you*

29. MINOR 28: The defendant also used Instagram and Kik to communicate with MINOR 28 between at least December 27, 2022, and December 30, 2022. MINOR 28 was seventeen years old and lived in Georgia; the defendant knew MINOR 28 was a minor. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 28 to persuade, induce, entice, and coerce MINOR 28 to produce child pornography.

a. For example, on December 30, 2022, while in Suffolk, in the guise of "misslincon Jessica Lincon" on Kik, the defendant used his iPad to communicate with MINOR 28 as follows:

Defendant: *lemme see you open ur legs and rub ur bulge babe*

[Minor 28 sends a media image. The thumbnail shows a picture of Minor 28's underwear.]

Minor 28: *Anything for you*

What else would you like to see

Defendant: *lemme watch you slide those off*

Minor 28: *Gladly*

Defendant: *ok*

[Minor 28 sends a media image. The thumbnail shows a picture of Minor 28's underwear.]

Minor 28: *There you go*

Defendant: *damn it's huge*

rub ur cock for me bby

[Minor 28 sends a media image. The thumbnail shows a picture of Minor 28's erect penis, which Minor 28 is grasping with his hand.]

Minor 28: *Gladly*

Defendant: *open ur keys bby lemme suck ur balls
legs lol*

[Minor 28 sends a media image. The thumbnail shows a picture of Minor 28's erect penis, which Minor 28 is grasping with his hand.]

Defendant: *put the camera down there i wanna lick ur balls
maybe you'd let me lick ur ass too*

Minor 28: *Maybe idk*

Defendant: *would be hot af*

[Minor 28 sends a media image. The thumbnail shows a picture of Minor 28's scrotum.]

Defendant: *you close bby*

Minor 28: *Yeah*

Defendant: *lemme watch u cum all over ur chest and lick it up babe*

Minor 28: *Can I pls see your tits bby
It will help me cum*

Defendant: *cum on them bby*

Minor 28: *Fuckkkkkkk*

Defendant: *do it bby*

Minor 28: *Gladly*

Defendant: *wish you were cumming in mr
me*

[Minor 28 sends a media image. The thumbnail shows a picture of Minor 28's face.]

Minor 28: *I came too quickly I could t get the camera open*

Defendant: *lemme see ur cock
how did it taste bby*

[Minor 28 sends a media image. The thumbnail shows a picture of Minor 28's erect penis, which Minor 28 is grasping with his hand.]

Minor 28: *Good*

Defendant: *rub it more for mommy*

[Minor 28 sends a media image. The thumbnail shows a picture of Minor 28's hand, which is grasping his penis.]

30. MINOR 29: The defendant also used Instagram and Kik to communicate with MINOR 29 on at least November 13, 2022. MINOR 29 was seventeen years old and lived in North Carolina. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 29 to persuade, induce, entice, and coerce MINOR 29 to produce child pornography.

a. For example, on November 13, 2022, while in Suffolk, in the guise of "misslincon Jessica Lincon" on Kik, the defendant used his iPad to communicate with MINOR 29 as follows:

Defendant: *how's ur lap doing bby*
Minor 29: *I'm soft now*
You should make me hard again
And I'll give you a reward
Defendant: *ur soft no way*
Minor 29: *Yeah*
Defendant: *lemme see*
[Minor 29 sends a media image. The thumbnail shows a picture of Minor 29's white shorts.]
Defendant: *lose the white shorts bby*
on video
Minor 29: *Hmmm*
Make me
Defendant: *how else am i gonna suck it*
Minor 29: *Well make me hard first*
And I'll take it off
Defendant: *maybe i like it soft first*
so it can grow in my mouth
Minor 29: *That sounds so hot*
But I wanna see you
Shirtless
Cmonn baby I know you can do it
Defendant: *head to toe video of u in bed in only i dried and you'll get sum*
in only undies
Minor 29: *Hmmm*
That sounds like a lot of workkkk I don't think I will
I could send you a video of me spraying cum everywhere tho
Defendant: *ok*
Minor 29: *But you'd have to earn it*
Defendant: *nah I'm not submissive*
ill just let you go
ig
Minor 29: *oh okay*
I'm not either lol
[Defendant sends a media image. The thumbnail shows a picture of a female's nude buttocks.]
Minor 29: *Holy fuckkkk*
Your such a good girl Jessica
[Minor 29 sends a media image. The thumbnail shows a picture of Minor 29's scrotum and erect penis.]

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Defendant: *lemme see a nut video*

31. MINOR 30: The defendant also used Instagram and Kik to communicate with MINOR 30 between at least April 10, 2022, and May 2, 2022. MINOR 30 was seventeen years old and lived in California. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 30 to persuade, induce, entice, and coerce MINOR 30 to produce child pornography.

a. For example, on April 10, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 30 as follows:

Defendant: *nice do you have any precum or
didn't mean or haha*

Minor 30: *A tiny bit*

Defendant: *csn i see*

[Minor 30 sends a media image. The thumbnail shows a picture of Minor 30's penis, which Minor 30 is grasping with his hand.]

Minor 30: *Idk how visible that is*

Defendant: *i wanna watch you stroke it bby
imagine it going into my pussy every stroke*

[Minor 30 sends a media image. The thumbnail shows a picture of Minor 30's erect penis, which Minor 30 is grasping with his hand.]

Minor 30: *If I did that i think i would cum*

Defendant: *that's ok bby. do you want to cum*

Minor 30: *I want to make you cum*

Defendant: *i might not be able to rn but that's not cuz of you
but I wann see you enjoy yourself*

Minor 30: *Can you send me a vid to finish me off
it can be from earlier*

Defendant: *i don't know if i can find one rn cuz i don't want my mom to see me scrolling
through pics lol
hold on i'll try*

Minor 30: *Okay*

Defendant: *zoom out lemme see u jerking fully with ur legs and feet behind you bby
[Minor 30 sends 2 media images. The thumbnail shows a picture of Minor 30's erect penis, which Minor 30 is grasping with his hand.]*

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Minor 30: *Imagine sitting on this mommy*

Defendant: *damn ur super hard*

Defendant: *will you lick ur cum in a video then for me*

Minor 30: *Yeah*

Defendant: *ok hurry bby*

[Minor 30 sends two media images. The thumbnail shows a picture of Minor 30's chest. In the picture, semen can be seen on Minor 30's chest.]

32. MINOR 31: The defendant also used Instagram and Kik to communicate with MINOR 31 between at least February 15, 2022, and February 16, 2022. MINOR 31 was fifteen years old and lived in North Carolina. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 31 to persuade, induce, entice, and coerce MINOR 31 to produce child pornography.

a. For example, on February 15, 2022, while in Suffolk, in the guise of "misslincon Jessica Lincon" on Kik, the defendant used his iPad to communicate with MINOR 31 as follows:

Defendant: *wyd*

Minor 31: *Yk what I'd doing*

Defendant: *no i don't lemme see*

Minor 31: *Nahh I can't*

Defendant: *lol you can it's on the dl here plus i can help you cum too*

Minor 31: *You right*

You go first tho

Defendant: *meh i gotta know you will tho cuz it's easy for you to say okay i will abs then never do it*

Minor 31: *How do ik you'll send*

Defendant: *cuz i offered already lol*

Minor 31: *It just feels wrong cause I got a girl
But you live in a whole different state*

Defendant: *yep so it'll never be in person*

[Minor 31 sends a media image. The thumbnail shows a picture of Minor 31's penis, which Minor 31 is grasping with his hand.]

Defendant: *fuck it looks big*

Minor 31: *Yeah*

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Your turn

Defendant: *ok hold up*
[Defendant sends a media image. The thumbnail shows a picture of a female's bare breasts and stomach.]

Minor 31: *Omg bruh*
You're hot
Send more

Defendant: *Get me wetter*
what all you got in your phone

Minor 31: *Not much saved of me*
Hold up

Defendant: *ok*
[Minor 31 sends a media image. The thumbnail shows a picture of Minor 31 in a bathroom with a towel around his waist.]

Minor 31: *Yo I don't got much time*

Defendant: *ok let's see what ur doing rn*
[Minor 31 sends a media image. The thumbnail shows a picture of Minor 31's erect penis, which Minor 31 is grasping with his hand.]

Minor 31: *You gotta send sun*
Sum

Defendant: *ok lemme see u rub it on video*
I'll show u more then
[Minor 31 sends a media image. The thumbnail shows a picture of Minor 31's erect penis, which Minor 31 is grasping with his hand.]

Defendant: *fuck it's big*

33. MINOR 32: The defendant also used Instagram and Kik to communicate with MINOR 32 between at least June 19, 2022, and June 20, 2022. MINOR 32 was a rising sophomore in high school and lived in North Carolina. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 32 to persuade, induce, entice, and coerce MINOR 32 to produce child pornography.

a. For example, on June 20, 2022, while in Suffolk, in the guise of “misslincon Jessica Lincon” on Kik, the defendant used his iPad to communicate with MINOR 32 as follows:

Defendant: *bby the videooooo*

Minor 32: *The photooooo*

Im close

Defendant: *lemme see u jerking it*

[Minor 32 sends a media image. The thumbnail shows a picture of Minor 32's erect penis, which Minor 32 is grasping with his hand.]

34. MINOR 33: The defendant also used Instagram and Kik to communicate with MINOR 33 between at least November 4, 2022, and December 4, 2022. MINOR 33 was sixteen years old and lived in Hampton, in the Eastern District of Virginia; the defendant knew MINOR 33 was a minor. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 33 to persuade, induce, entice, and coerce MINOR 33 to produce child pornography.

a. For example, on November 13, 2022, while in Suffolk, in the guise of "misslincon Jessica Lincon" on Kik, the defendant used his iPad to communicate with MINOR 33 as follows:

Defendant: *lemme watch*

Minor 33: *I'll use that one*

Defendant: *if you do you'll get more during*

Minor 33: *I have a small sick tho*

Defendant: *no you don't bby*

I don't need 8 inches anyways

Minor 33: *If I send you a vid of it will you send me more pics.*

Defendant: *needs to be a few sexy vids and i will babe*

[Minor 33 sends a media image. The thumbnail shows a picture of Minor 33's erect penis, which Minor 33 is grasping with his hand.]

Defendant: *lemme watch u head to toe body vid babe*

they can't be that short bb

[Minor 33 sends a media image. The thumbnail shows a picture of Minor 33's erect penis, which Minor 33 is grasping with his hand.]

Defendant: *mmmm let ur dick lay flat baby so i can imagine sucking ur*

[Minor 33 sends a media image. The thumbnail shows a picture of Minor 33's erect penis.]

Minor 33: *Now send me some good pics and vids*

So I can do it harde

Defendant: *lemme such ur balls bby*

[Minor 33 sends media image. The thumbnail shows a picture of Minor 33's scrotum.]

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Minor 33: *Send me your pussy and other stuff like that
So I can send more*

Defendant: *too close bby open ur legs*

[Minor 33 sends media image. The thumbnail shows a picture of Minor 33's scrotum.]

35. MINOR 34: The defendant also used Instagram and Kik to communicate with MINOR 34 between at least September 2, 2022, and September 28, 2022. MINOR 34 was fifteen years old and lived in Alabama; the defendant knew MINOR 34 was a minor. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 34 to persuade, induce, entice, and coerce MINOR 34 to produce child pornography.

a. For example, on September 2, 2022, while in Suffolk, in the guise of "misslincon Jessica Lincon" on Kik, the defendant used his iPad to communicate with MINOR 34 as follows:

Defendant: *ur d hard bby*

Minor 34: *Yes*

*Your touching it though my shorts
Feeling it grow*

Defendant: *rubbing my fingers up and down it*

Minor 34: *Yes*

Defendant: *lemme see bby*

[Minor 34 sends a media image. The thumbnail shows a picture of Minor 34's erect penis.]

Minor 34: *Can't you see it
With your lips around it*

Defendant: *fuck ur big*

Minor 34: *Not even all the way yet*

Defendant: *what no way*

Minor 34: *Oh yes*

Defendant: *lemme see it in a video from like base to tip*

[Minor 34 sends a media image. The thumbnail shows a picture of the base of Minor 34's erect penis, which Minor 34 is grasping with his hand.]

Minor 34: *I'd hit you in the cheek a few times
Stay with me*

I know your so wet rn

Defendant: *zoom back some*

jerk it slowly daddy

Minor 34: *You just wanna sit there and rub*

[Minor 34 sends a media image. The thumbnail shows a picture of a portion of Minor 33's erect penis.]

36. MINOR 35: The defendant also used Instagram and Kik to communicate with MINOR 35 between at least July 11, 2022, and July 25, 2022. MINOR 35 was fifteen years old and lived in Alabama. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 35 to persuade, induce, entice, and coerce MINOR 35 to produce child pornography.

a. For example, on July 11, 2022, while in Suffolk, in the guise of "misslincon Jessica Lincon" on Kik, the defendant used his iPad to communicate with MINOR 35 as follows:

Defendant: *ok lemme see you in bed no blankets head to toe video bby*

[Minor 35 sends a media image. The thumbnail shows a picture of Minor 35's face.]

Defendant: *slower bby*

[Minor 35 sends a media image. The thumbnail shows a picture of Minor 35's face.]

Defendant: *rub ur bulge bby lemme watch*

[Minor 35 sends a media image. The thumbnail shows a picture of Minor 35's underwear.]

Defendant: *damn you got precum that's hot*

lemme watch u slide those off bby

[Minor 35 sends a media image. The thumbnail shows a picture of Minor 35's underwear. In the picture, Minor 35's hand is at the top of his underwear.]

Defendant: *yours is big*

omg

and thick

strip bby like i said

Minor 35: *after that do i get to see you finger*

Defendant: *you'll see more bby*

Minor 35: *good*

[Minor 35 sends a media image. The thumbnail shows a picture of Minor 35's underwear.]

Minor 35: *you better not save*

Defendant: *i won't bby jerk your big cock for me*

Minor 35: *i want see your camera roll tho*

idk i've never done the
Defendant: *i'll show you the deleted chats once we come*
Minor 35: *ok*
Defendant: *but do you wanna cum with me*
[Minor 35 sends a media image. The thumbnail shows a picture of Minor 35's erect penis, which Minor 35 is grasping with his hand.]
Defendant: *bby*
Minor 35: *yea*
Defendant: *i wanna ride you*

37. MINOR 36: The defendant also used Instagram and Kik to communicate with MINOR 36 between at least December 7, 2021, and February 14, 2022. MINOR 36 lived in Missouri; the defendant knew that MINOR 36 was a minor. Nonetheless, the defendant used the Jessica Lincon persona to catfish MINOR 36 to persuade, induce, entice, and coerce MINOR 36 to produce child pornography.

a. For example, on December 27, 2021, while in Suffolk, in the guise of "misslincon Jessica Lincon" on Kik, the defendant used his iPad to communicate with MINOR 36 as follows:

Defendant: *I miss your big d*
[Minor 36 sends a media image. The thumbnail shows a picture of Minor 36 standing in a bathroom without a shirt on. In the picture, Minor 36 is wearing pants.]
Defendant: *Mmmm ur v line is perf*
Minor 36: *Thanks*
Your ass is amazing
[Minor 36 sends a media image. The thumbnail shows a picture of Minor 36 standing in a bathroom naked. In the picture, Minor 36's erect penis is shown.]
Defendant: *Show me how you'd fuck me bby*
Minor 36: *Yess mommy*
Defendant: *Good boy*
[Minor 36 sends a media image. The thumbnail shows a picture of Minor 36's face and bare chest.]
Defendant: *I wanna see how ur ass looks like when you're pushing into me babe*
[Minor 36 sends a media image. The thumbnail shows a picture of Minor 36's side, including the side of his buttocks.]
Minor 36: *Yes mommy*

Can get a pic of you baby

Defendant: *Mmmm bby that's hot. Hold on a few ok*

Minor 36: *Ok*

[Minor 36 sends a media image. The thumbnail shows a picture angled up towards Minor 36's face. The picture shows Minor 36's face in the background and a portion of his penis in the foreground.]

Defendant: *Since you showed ass*

[Defendant sends a media image. The thumbnail shows a picture of a nude female in front of a mirror. The nude female's buttocks can be seen in the picture.]

Minor 36: *Thank you babe*

Defendant: *Show me how you'd fuck it*

Minor 36: *Yes mommy*

Defendant: *Ok bby*

[Minor 36 sends 2 media images. The thumbnail shows a picture of Minor 36's face and bare chest.]

Defendant: *Does it get you close to cumming lol*

Minor 36: *Yes*

Defendant: *Don't cum yet*

Minor 36: *Ok*

[Minor 36 sends a media image. The thumbnail shows a picture of Minor 36's face and bare chest.]

Defendant: *Csn I see you on your back like you were fucking me like I was riding you but I want see from the other angle babe*

[Minor 36 sends a media image. The thumbnail shows a picture of Minor 36's face and bare chest.]

Defendant: *Other angle now*

Minor 36: *Ok*

[Minor 36 sends a media image. The thumbnail shows a picture of Minor 36's erect penis, which Minor 36 is grasping with his hand.]

Defendant: *Straddle ur phone bby I wanna lick ur balls and ass*

[Minor 36 sends a media image. The thumbnail shows a picture of Minor 36's scrotum and erect penis.]

Defendant: *Mmmmm csn I like u there*

Minor 36: *Yes*

[Minor 36 sends a media image. The thumbnail shows a picture of Minor 36's erect penis, which Minor 36 is grasping with his hand.]

38. Furthermore, on or about March 5, 2024, in Suffolk, Virginia, in the Eastern District of Virginia, the defendant, GARY OWENS JR., did knowingly possess using any means

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and facility of interstate and foreign commerce and in and affecting interstate commerce visual depictions contained on the iPad Pro [S/N Q63N7DPX24], which was manufactured in China, the production of which involved the use of a minor engaging in sexually explicit conduct, and such visual depictions were of such conduct, all in violation of 18 U.S.C. § 2252(a)(4)(B), (b)(2).

39. Specifically, on the iPad Pro, the defendant had an application titled "Calculator%," which was designed to appear like a normal calculator. There were six folders inside this application. The defendant named these folders "Jessica," "2019," "2020," "2021," "2022," and "2023." The 2022 folder contained approximately 904 images and videos, which the defendant had affirmatively saved down from Kik chats. Most of these files show males in some stage of undress or engaged in a sex act, including pictures and videos of MINOR 1. This folder included the video of MINOR 7 described above at paragraph 9(b), the video of MINOR 21 described above in paragraph 22(b), and additional videos of minors engaged in sexually explicit conduct, including but not limited to the following:

a. The 2022 folder also included seven videos of MINOR 5 engaged in sexually explicit conduct: (1) MINOR 5 takes off his underwear, exposing his erect penis (8 seconds); (2) MINOR 5 uses his hand to masturbate his erect penis (16 seconds); (3) zoomed onto MINOR 5's anus, which he digitally penetrates (8 seconds); (4) zoomed in on MINOR 5's anus and scrotum, which he grasps with his hand (12 seconds); (5) video of MINOR 5's face, scrotum, and anus, which MINOR 5 digitally penetrates (11 seconds); (6) video of MINOR 5's anus, which he digitally penetrates for seven seconds (9 seconds); and (7) MINOR 5 uses his hand to masturbate his erect penis and ejaculates (26 seconds).

b. The 2022 folder also included a video of MINOR 8. The full video is 22 seconds long. In it, MINOR 8 pushes his underwear down, thus exposing his erect penis. The male then uses his hand to masturbate his penis.

c. The 2022 folder included two videos of MINOR 9. One was the video described above at paragraph 11(b). In another video, which lasts 3 seconds, MINOR 9 uses his hand to masturbate his erect penis.

d. The 2022 folder also included a video of MINOR 10. The full video is 5 seconds. In it, MINOR 10 uses his hand to masturbate his erect penis.

e. The 2022 folder also included a video of MINOR 11. The full video is 11 seconds. In it, MINOR 11 uses his hand to masturbate his erect penis.

40. The other folders – “2019,” “2020,” “2021,” and “2023” – contained images depicting similar conduct. However, because the defendant deleted the associated Kik chats, the minors depicted in the images in these folders remain unidentified. In total, these folders contained at least 1800 images and videos of child sexual abuse material and age questionable files. The “Jessica” folder contained images that the defendant used to pose as a minor female in his communications with teenage boys.

41. The Internet is an interconnected network of computers with which one communicates when on-line, is a network that crosses state and national borders, and is a facility of interstate and foreign commerce.

42. This statement of facts includes those facts necessary to support the defendant’s plea of guilty to Count 1 of the Indictment in this case. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant’s case.

43. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,

Jessica D. Aber
United States Attorney

Date: 11/12/2024

By: Laura D. Withers
Laura D. Withers
E. Rebecca Gantt
Assistant United States Attorneys


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After consulting with my attorney, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



GARY OWENS, JR.

I am Rodolfo Cejas, defendant's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.



Rodolfo Cejas, Esq.
Attorney for GARY OWENS, JR.